## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE	)
COMMISSION,	)
Plaintiff,	)
	)
v.	) CIVIL ACTION NO. 12-12324-MLW
	)
BIOCHEMICS, INC., JOHN J. MASIZ,	)
CRAIG MEDOFF and GREGORY S.	)
KRONING,	)
Defendants.	)

## **RECEIVER'S MOTION FOR RELEASE OF FUNDS**

Mark G. DeGiacomo, the court-appointed receiver of Biochemics, Inc. and the Shareholder Resolution Trust (the "Receiver"), hereby requests the entry of an Order requiring the release to the Receiver of funds including any and all accrued interest held in the Court's registry, as previously authorized by the Court.

In support of this Motion, the Receiver respectfully states:

- 1. On June 28, 2018, the plaintiff, Securities and Exchange Commission ("SEC") filed a motion to appoint a receiver (Dkt. No. 423) of defendant Biochemics, Inc. ("Biochemics") and its related party, the Shareholder Resolution Trust (the "Trust").
- 2. On October 9, 2018, the Court entered an Order (Dkt. No. 452) granting the SEC's motion and appointing the Receiver (the "Receiver Order").
- 3. On October 25, 2018, the Receiver filed a motion seeking turnover of approximately \$437,000 held in the Court's registry (Dkt. No. 459).
- 4. By Order dated November 2, 2018, the Court granted the Receiver's motion and authorized the turnover of such funds (Dkt. No. 466).

So ordund Well, DJ Yec. 18, 2018

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